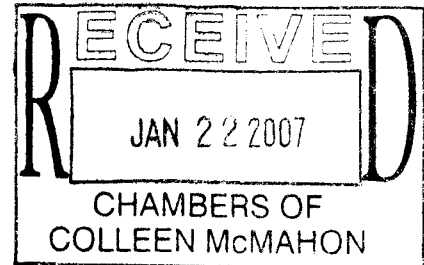


**Green & Willstatter**  
ATTORNEYS AT LAW  
200 MAMARONECK AVENUE  
SUITE 403  
WHITE PLAINS, NEW YORK 10601



THEODORE S. GREEN

(914) 948-5656

RICHARD D. WILLSTATTER

FAX (914) 948-8730

January 19, 2007

HON. COLLEEN McMAHON  
United States District Court  
300 Quarropas Street  
White Plains, New York 10601

Re: United States v. Hurgenes Pignard  
06 Cr. 718 (CM)

Dear Judge McMahon:

This letter is an application for a renewed bail application on behalf of Mr. Pignard. We respectfully ask that the Court hear the application when the matter is next on the calendar on February 2, 2007.

This Court previously heard a bail application on behalf of Mr. Pignard on September 25, 2006, when Mr. Pignard was represented by Michael Keesee, Esq. Based on my discussions with Mr. Keesee, I am aware that a number of family members were present at that application and that Mr. Keesee may well have referred to availability of some real property as security for bail.

I am requesting reconsideration based on our setting forth what I believe may be a more detailed presentation as to the real property available (supported by documentation) as well as documentation regarding potential co-signors.

Mr. Pignard is charged in a multi-count indictment that includes allegations of his participation in two attempted robberies of financial institutions as well as a weapon-possession count pursuant to 18 U.S.C. 924(c). He has a prior state felony

*1/22/07*  
**MEMO ENDS**  
*I will not grant  
this defendant bail, no  
matter who co-signs  
the bond, for the  
reasons stated at the  
last bail hearing  
he is not  
bailable*  
*Colleen McMahon*

conviction for criminal possession of a controlled substance in the fourth degree for which he received a five-year probationary sentence in 2003.

At the time of his arrest, Mr. Pignard resided with his wife, Sonia, and a nephew that the couple was raising, at an apartment in Piermont, New York.

Mr. Pignard was born in New York and is a United States citizen. He was raised primarily in Rockland County, attended public schools there and has strong family ties to the Rockland County area. His mother, Philomene Pignard, owns a home at 37 Gurnee Avenue, Haverstraw, New York 10927. As per loan closing documents which I annex to this letter, the house was refinanced in November 2006 and, at that time, it was appraised at \$329,500. The amount of the mortgage is \$180,950. Mrs. Pignard is willing to offer this property as security or partial security for a bail bond.

Among the persons who would be available to co-sign a bail bond are:

- Ms. Philomene Pignard, the defendant's mother, an employee of Good Samaritan Hospital, Suffern, New York. A copy of a recent pay stub for Ms. Pignard, as well as her New York driver license, is annexed.

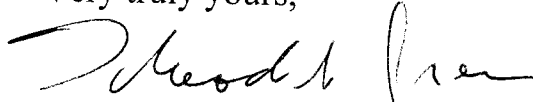
- Mr. Mario Pignard, the defendant's brother. Mario is employed as a film technician with Sourcemaker, Inc. A copy of recent pay documents and his New York driver license are attached.

- Marie Lafleur, the defendant's sister. Ms. Lafleur is employed by Nyack Manor Nursing Home. Documentation as to her earnings and her New York driver license are annexed.

In addition to these persons, Mr. Pignard's other sister, Phara Pignard, is also available as a cosignor. Ms. Phara Pignard is a graduate student at the State University of New York, Albany, where she is studying towards a masters degree in social work. She also works part-time as a graduate teaching assistant.

We respectfully urge a bail package that includes a \$150,000 bond, partially secured by a \$75,000 mortgage against the property owned by Philomene Pignard.

Very truly yours,



THEODORE S. GREEN

cc: JOHN P. COLLINS, JR., ESQ.  
Assistant United States Attorney  
300 Quarropas Street  
White Plains, New York 10601